

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

TROY D. GERMAN,	)	
	)	
Plaintiff,	)	
	)	Case No. CIV-19-751-F
v.	)	
	)	
BILLY D. "RUSTY" RHOADES,	)	
individually;	)	
	)	
MICHAEL HARRELL, individually;	)	
	)	
BRIAN ORR, individually;	)	
	)	
-and-	)	
	)	
MEGAN SIMPSON, individually,	)	
	)	
Defendants.	)	

**PLAINTIFF'S AMENDED FINAL EXHIBIT LIST**

**COMES NOW** Plaintiff Troy D. German and submits the following Amended Final Exhibit List in accordance with the Court's Order granting him leave to amend his final exhibit list:

Exhibit List

No.	Description	Bates-Stamp
1.	Indictment - CF-2019-713	
2.	Information - CF-2019-967	
3.	OSCN Docket Sheet for both blackmail cases filed against CPT German	
4.	DPS Notice of Suspension with Pay documents	German 377-389
5.	CPT Troy German Retirement	German 390
6.	Troop Z Investigative File (excluding interview summaries)	German 111-376

7.	Rusty Rhoades, Michael Harrell, and Brian Orr interview summaries and audio recordings of their interviews by Troop Z	
8.	July 2018 Captain Promotional Examination Questions	German 308-316
9.	Transcript of Brian Orr audio recording	
10.	All audio recordings produced by CPT Troy German, including recordings of Brian Orr and voicemail recordings	
11.	Invoice and Receipts from the Law Office of Michael S. Johnson	German 409
12.	German W-2s for 2015, 2016, 2017, and 2018	Confidential German 411-417
13.	OMES Insurance Confirmation Statement	Confidential German 399-402
14.	OLERS Statement - 20 Years Credited Service	Confidential German 403-404
15.	OLERS Statement - 30 Years Credited Service	Confidential German 407-408
16.	Text message between MAJ Garrett Vowell and Michael Harrell	
17.	Termination paperwork of Megan Simpson	
18.	Job Postings for Troop A and Troop R positions	
19.	DPS Press Release and Comments regarding Grand Jury Indictment	
20.	Oklahoma Highway Patrol Operations Manual General Order Number 02.02.00, Purpose, Primary Function and Philosophy of the Patrol	
21.	Oklahoma Highway Patrol Operations Manual General Order Number 01.19.00, Professional Conduct Expectations and Core Values	
22.	Oklahoma Highway Patrol Operations Manual General Order Number 01.20.00, Rules of Conduct	
23.	Oklahoma Highway Patrol Operations Manual General Order Number 01.24.00, Captain Promotional Process (commissioned members)	

24.	Brian Orr #52, I-19-10, Supplemental Summary and Findings From Secondary Investigation, Specifically Truthfulness	
25.	May 15, 2018 Memorandum from Major Jack McCoy to Colonel Michael Harrell re: CPT Troy German #41 retention letter	
26.	Oklahoma Law Enforcement Retirement System Invoice for Sick Leave Credit dated March 14, 2019	
27.	January 20, 1998 Letter from Bob A. Ricks to Troy German	
28.	Performance Management Process 01/01/17-11/14/17 for Troy D. German	
29.	Brian Orr Command Assessment Scores for 3/14/2018 Interview	
30.	Board Members Non-Disclosure Memorandum from CPT J.K. Allread to COL Harrell dated 03.12.18	
31.	Board Members Non-Disclosure Memorandum from CPT Jason Holt to COL Harrell dated 03.12.18	
32.	Board Members Non-Disclosure Memorandum from Brian Orr to COL Harrell dated 03.12.18	
33.	Board Members Non-Disclosure Memorandum from Garrett Vowell to COL Harrell dated 03.12.18	
34.	Captain-Functional Assessment/Interview Schedule: Promotional Process – Troop R – FRIDAY, July 20, 2018	
35.	Captain-Functional Assessment/Interview Schedule-Promotional Process – Troop A – Wednesday, July 18, 2018	
36.	Brian Orr Application for Captain and Brian Orr Email to HR dated Friday, July 6, 2018	
37.	Personnel Transaction Freeze Exception Request dated May 17, 2017	
38.	Vacancy Announcement - Troop A – Opened June 28, 2018	
39.	Vacancy Announcement – Troop R – Opened June 28, 2018	

40.	State of Oklahoma Certified List for Troop A Promotion	
41.	Email from Shavonne Lafayette to Michael Harrell dated August 13, 2018	
42.	State of Oklahoma Certified List for Troop R Promotion	
43.	Board Members Non-Disclosure Memorandum from Garrett Vowell to COL Harrell dated 07.17.18, 07.20.17, and 07.23.18	
44.	Promotional Candidates Non-Disclosure of Oral Interview Information dated 07.18.18, 7.20.18 from Brian Orr to Michael Harrell	
45.	Captain Promotional Interview – July 2018 – Brian Orr Answers	
46.	Score Sheets for All Candidates in Troop A Promotional Interview – July 2018	
47.	Score Sheets for All Candidates in Troop R Promotional Interview – July 2018	
48.	Command Assessment Applicant List and Score Sheet & Score Cards for Troop A and Troop R Captain Promotional Processes – July 2018	
49.	Email from Megan Simpson to Barrett Bowers dated December 23, 2018 (showing BCC to Jason Holt)	
50.	Email from Megan Simpson to Rusty Rhoades and Michael Harrell dated August 16, 2019	
51.	Email from Megan Simpson to Rusty Rhoades dated June 28, 2019 with attachment Press Release	
52.	Email from Rusty Rhoades to Brian Orr dated March 2, 2018	
53.	Email from JD Wilson to Majors Group (BCC to Rusty Rhoades and Michael Harrell) dated August 16, 2018 re: Promotions	
54.	Email from Chip Keating to Rusty Rhoades and others dated August 17, 2019 re: Pending Personnel Matters	
55.	Chief's Order # 18-17578	

56.	Audio Recordings from Brian Orr #52, I-19-10, Supplemental Summary and Findings From Secondary Investigation, Specifically Truthfulness	
57.	Documents identified by any defendant and not otherwise objected to by Plaintiff	
58.	Documents produced by any party or any person and not otherwise objected to by Plaintiff	
59.	Documents necessary for rebuttal	
60.	Documents necessary for impeachment	
61.	Documents identified as exhibit at any deposition and not otherwise objected to by Plaintiff	

Dated this 12th day of January, 2021.

/s/Barrett T. Bowers  
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### **CERTIFICATE OF SERVICE**

I certify that on the 12th day of January, 2021, I served a true and correct copy of the above and foregoing on the following counsel of record:

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/s/Barrett T. Bowers

Barrett T. Bowers